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Secretary for
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California Regional Water Quality Control Board
North Coast Region
Bob Anderson, Chairman

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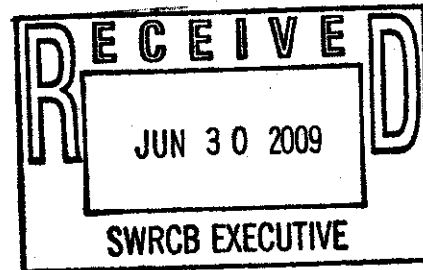
Arnold
Schwarzenegger
Governor

TO: Jeanine Townsend, Clerk to the Board
State Water Resources Control Board

FROM: Catherine E. Kuhlman
Executive Officer

DATE: June 30, 2009

SUBJECT: COMMENT LETTER – LANDSCAPE IRRIGATION GENERAL PERMIT



Dear Board Members:

We appreciate the efforts of State Water Board staff in preparing this draft permit and their considerable dedication to involving Regional Water Board staff and other stakeholders in the permit development process. Overall, the permit strikes a fair balance in facilitating recycled water use in a manner that is protective of water quality and public health.

The draft permit has been changed since the last public draft was circulated for comment. Some of these changes may have resulted in unclear requirements that could cause misinterpretation by the regulated parties. We suggest that some revisions occur in order to add clarity to the permit. Our specific recommendations are as follows:

Provision No. 16 – This provision describes reporting requirements for accidental releases of recycled water or other events that pose a threat to public health or the environment. The current language requires the Administrator to report such events but doesn't specify a reporting timeline nor does it specify where such report is filed. The provision further requires that the Producer/Distributor report non-compliance to Regional Water Boards and other entities under set timelines. Since the site Administrator is likely to be the first responsible party with knowledge of the non-compliance, we suggest that the language be modified to require that the Administrator make notifications within the same timelines required for the Producer/Administrator.

Provision No. 19 – This provision is confusing and may lead to misinterpretation by regulated parties. The current language could lead a discharger to the conclusion that

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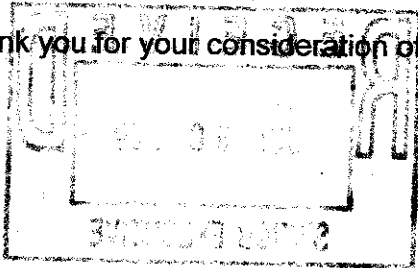
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existing permits for water reclamation/treatment facilities are no longer applicable once all recycled water discharge sites are covered by the General Permit. We suggest that the language be slightly modified as follows -

"Upon enrollment in this General Permit, if the enrollee is subject to individual waste discharge requirements or water reclamation requirements, the provisions of such requirements that apply to landscape irrigation sites covered by the General Permit are null and void ~~to the extent that the discharge is regulated by this order.~~"

Thank you for your consideration of these comments.



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